

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE

CLASSMATES.COM CONSOLIDATED
LITIGATION

CASE NO. C09-00045-RAJ

DECLARATION OF THEODORE H.
FRANK IN SUPPORT OF OBJECTION
OF MICHAEL I. KRAUSS

CLASS ACTION

**Note on Motion Calendar:
December 16, 2010 at 1:30 p.m.**

I, THEODORE H. FRANK, hereby declare as follows:

1. I am one of the attorneys for objector, Michael I. Krauss, in this lawsuit. I am competent to testify, and make this declaration based on my own personal knowledge.

2. When class counsel settled this case, their court filings misleadingly implied that the settlement was worth \$9.5 million.

3. These filings appear to have actually misled journalists that reported on the case.

4. For example, PC Magazine reported that "Classmates.com has agreed to pay more than \$9.5 million to settle a class-action suit." A true and correct copy of this story from March 17, 2010, is attached as Exhibit 1.

5. Wired Magazine headlined its story on the settlement "Lonely Classmates.com Users Get \$9.5M in Lawsuit." A true and correct copy of this story from March 16, 2010, is attached as Exhibit 2.

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OF OBJECTION OF MICHAEL I. KRAUSS - 1
CASE NO. C09-00045-RAJ

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1 I declare under penalty of the laws of perjury that, to the best of my knowledge,
2 information and belief, the foregoing is true and correct.

3 DATED this 18th day of November, 2010, at Arlington, Virginia.

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5 /s/ Theodore H. Frank
6 Theodore H. Frank
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CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

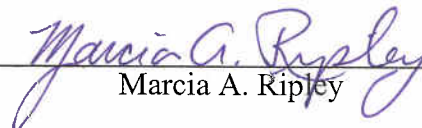
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I hereby further certify that on this day I caused a true and correct copy of the foregoing to be served via First Class Mail upon addressees designated above.

DATED this 18th day of November, 2010.



Marcia A. Ripley